

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

CIVIL ACTION NO. 03-12499 MLW

TERRI L. PECHNER-JAMES)
and SONIA FERNANDEZ)
Plaintiffs)
)
VS.)
)
CITY OF REVERE, THOMAS)
AMBROSINO, MAYOR, CITY)
OF REVERE POLICE DEPT.)
TERRENCE REARDON, CHIEF)
OF POLICE, BERNARD FOSTER)
SALVATORE SANTORO, ROY)
COLANNINO, FREDERICK)
ROLAND, THOMAS DOHERTY)
JOHN NELSON, JAMES RUSSO)
MICHAEL MURPHY and)
STEVEN FORD)
Defendants)

**PLAINTIFF, SONIA FERNANDEZ LIST OF EXHIBITS FOR SUMMARY
JUDGMENT MOTION**

Exhibit A- Diploma from Bunker Hill Community College

Exhibit B- Mayor's Letter of Appointment to the Revere Police Department

Exhibit C- List of Education and Training Courses Completed by Plaintiff

C.1 Advanced 1997 Search and Seizure Clinic sponsored by the Commonwealth Police Service, Inc: Date of Completion: February 28, 1997

C.2. Rape Instruction: sponsored by the Massachusetts Criminal Justice Training Council held at MCJTC, Tewksbury from May 19, 1997 to May 23, 1997.

C.3. Letter of appreciation from ERA Tri-City Associates signed by Ignazio Amato dated October 9, 1997.

C.4. Gang Conference: sponsored by the National Law Enforcement Institute of Boston, MA from September 9 and 10, 1998.

C 5. Investigative Interviewer Training For Spanish-Speaking Professionals sponsored by the Office of the District Attorney from June-September 1998.Certificate of Completion and Letter of Appreciation.

C 6. Certification of Completion: Basic American Sign Language Course by the Revere Commission of Handicapped Affairs dated December 18, 1998.

C.7 Letter of Appreciation from Bunker Hill Community College dated May 28, 1999 for being Featured Speaker at the Spring 99 Recognition Ceremony of the Revere Chance Project.

C.8. Certificate of Completion of the Teen Dating Violence Awareness Training Program sponsored by the Massachusetts Department of Education dated November 1999.

C.9. Certificate of Completion of the Restorative Justice & Peacemaking Circles sponsored by the Chelsea/Revere Peacemaking Planning Committee & ROCA, Inc. from August 20-13, 2000.

C.10. Panel member at training on Domestic Violence for care providers sponsored by Child Care Choices of Boston. Letter of Appreciation dated June 8, 2000.

C.11. Letter of Appreciation from the Area Director of Department of Social Services dated May 10, 2000 for work with the Department's clients.

Exhibit D- Hearing Disability confirmed by Beth Israel Deaconess Medical Center

Exhibit E- Plaintiff's MCAD complaint

Exhibit F- Professional Notes from North Suffolk Mental Health Association

Exhibit G- Professional Notes from Beth Israel Deaconess Medical Center

Exhibit H- List of Police Officers Essential Tasks

Exhibit I- Involuntary Retirement Application filed by Chief Reardon for Plaintiff

Exhibit J- Administrative Determination of Disability by PERAC

Exhibit K- Mayor Ambrosino's Statement of Undisputed Facts

Exhibit L- M.G.L.c. 43 § 56-61

Exhibit M- Mayor Ambrosino's Statement of Undisputed Facts

Exhibit N- Gonsalves v City of New Bedford, 939 F. Supp 915 (1996)

Exhibit O- Affidavit of Thomas Ambrosino & errence Reardon appointment letter

Exhibit P- Revised Ordinances of the City of Revere, MA § 2.60.30

Exhibit Q- M.G.L.c. 7 § 49 and 840 CMR 10:00

Exhibit R- M.G.L.c. 30 A § 14

Exhibit S- Brief Massachusetts Administrative Determination in Federal Court: the Application of Res Judicata and Collateral Estoppel

Exhibit T- Mayor Ambrosino and Chief Reardon's Supplemental Answers to Interrogatories

Exhibit U- Attorney Collins Treatise on the Chief's Guide to Injured on duty. Chapter 2

Exhibit V –Memorandum on Municipal Liability

Exhibit W- Sexual Harassment Policy of the Revere Police Department dated April 1, 1999.

Exhibit X- Plaintiff's Verified Complaint with Attachments